

# Child Welfare Policy Manual

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## Questions & Answers

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### 6.16A Cost allocation for transitioning systems

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**1. Question: What federal financial participation (FFP) rate are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period?**

**Answer:** S/TACWIS projects are eligible for 50% FFP for the share of project costs allocable to title IV-E during the August 1, 2016 - July 31, 2018 transition period.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16
- **Legal and Related References:** Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.56(a); 80 FR 48200 at 48291 (issued August, 11, 2015); 81 FR 35450 at 35472 (issued June 2, 2016)

**2. Question: What cost allocation methodologies are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period for development and operational costs?**

**Answer:** During the August 1, 2016 - July 31, 2018 transition period, title IV-E agencies with a S/TACWIS project may claim title IV-E funding according to the cost allocation methodology approved by ACF for development or the operational cost allocation plan approved by the Department, or both, per paragraph 1355.56(a).

Activities and costs must be eligible for title IV-E funding and be described in an applicable APD, per 46 CFR 95.610.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16
- **Legal and Related References:** Section 474(c) of the Social Security Act; 45 CFR 1355.56(a); 45 CFR 95.610; 81 FR 35472 (issued June 2, 2016); 80 FR 48219 (issued August 11, 2015)

**3. Question: May a title IV-E agency use their existing S/TACWIS cost allocation methodology for continued S/TACWIS work after the 24-month transition period?**

**Answer:** No. The existing S/TACWIS cost allocation methodology is only available for S/TACWIS projects and related project costs during the 24-month transition period from August 1, 2016 - July 31, 2018, per paragraph 1355.56(a).

After the transition period ends on July 31, 2018, S/TACWIS projects that have transitioned to CCWIS may receive CCWIS cost allocation per 1355.57(a). S/TACWIS projects that have been classified as non-CCWIS may receive non-CCWIS cost allocation per 1355.57(f).

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16
- **Legal and Related References:** 45 CFR 1355.56(a); 45 CFR 1357(a), (c), (e), and (f); 81 FR 35472, 35474 - 35475 (issued June 2, 2016); 80 FR 48219, 48221 - 48222 (issued August 11, 2015)

**4. Question: What requirements must a title IV-E agency's S/TACWIS or non-S/TACWIS system transitioning to a CCWIS meet to qualify for CCWIS cost allocation?**

**Answer:** The title IV-E agency must ensure that the transitioning system, when completed, must 1) meet the CCWIS project requirements at section 1355.52; and, 2) all automated functions developed after July 31, 2018 must meet the CCWIS design requirements of section 1355.53. The title IV-E agency must also have an approved operational cost allocation plan for their CCWIS, effective October 1, 2019, pursuant to 45 CFR 95.631(b).

If the system meets the above requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions pursuant to section 1355.57(a)(2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the Transition Period section.

- **Source/Date:** 11/10/16; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b); 45 CFR 1355.52(i)(1); 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35468 and 35474 - 35475 (issued June 2, 2016) 80 FR 48200 at 48216 - 48217 and 48200 - 48221 (issued August 11, 2015)

**5. Question: May a title IV-E agency transitioning a S/TACWIS to a CCWIS claim CCWIS operational funding after July 31, 2018 for the maintenance of an automated function developed by July 31, 2018 that does not meet the CCWIS design requirements of paragraph 1355.53(a)?**

**Answer:** Yes, a title IV-E agency may claim CCWIS operational funding for this automated function provided the title IV-E agency has an approved cost allocation plan, pursuant to 45 CFR 95.631(b), and the automated function meets three conditions, pursuant to 1355.57(a)(2). Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the transition period section.

- **Source/Date:** 4/24/2017; (4/2/2020)
- **Legal and Related References:** 45 CFR 95.631(b), 1355.53(a) and 1355.57(a); 81 FR 35450 at 35468 - 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48217 and 48220 - 48221 (issued August 11, 2015)

**6. Question: How must a title IV-E agency determine if an automated function "is consistently used by all child welfare users responsible for the area supported by the automated function" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?**

**Answer:** "Consistently used" means that public and private child welfare workers use an automated function as required by the title IV-E agency. Examples of an automated function not being consistently used are:

✎ workers interpreting data fields differently than instructed and entering incorrect data because the CCWIS data fields are not clearly labeled; and

✎ workers skipping required steps and screens because they are not consistently trained on the CCWIS case management tool.

The phrase "by all child welfare workers responsible for the area supported by the automated function" means that all workers responsible for a task use the automated function(s) designed for the task in the manner required by the title IV-E agency. Examples of all workers responsible for a task not using the required automated function are:

✎ some workers using different automated assessment tools when the title IV-E agency requires that all workers conducting assessments use a specified automated assessment tool; and

✎ some workers not entering home visit notes into CCWIS within the timeframe required by the title IV-E agency.

This question and answer is repeated in the Initial Submission and Cost Allocation for New CCWIS sections.

- **Source/Date:** 09/19/2019
- **Legal and Related References:** 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii); 81 FR 35450 at 35468 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 and 48221 (issued August 11, 2015)

**7. Question: How does a title IV-E agency determine if a CCWIS automated function is "duplicated within the CCWIS or systems supporting child welfare contributing agencies" pursuant to paragraphs 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii)?**

**(Deleted 02/03/2022)**

**8. Question: Must the title IV-E agency follow the CCWIS design requirements described in 1355.53(a) for development work done after July 31, 2018 on automated functions of a system transitioning to CCWIS?**

**Answer:** Yes, unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Design Requirements section.

- **Source/Date:** 4/2/2020
- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

**9. Question: Must the title IV-E agency comply with the CCWIS design requirements described in paragraph 1355.53(a) for maintenance done after July 31, 2018 on automated functions of a system transitioning to a CCWIS?**

**Answer:** It depends.

If an automated function's development is exempt from the CCWIS design requirements pursuant to paragraph 1355.53(b), maintenance work on the automated function is not required to comply with the CCWIS design requirements.

If an automated function's development complies with the CCWIS design requirements, maintenance work on the automated function must comply with the design requirements unless exempted by paragraph 1355.53(b)(2).

This question and answer is repeated in the Design Requirements section.

- **Source/Date:** 4/2/2020

- **Legal and Related References:** 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35468 - 35471 and 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48221 (issued August 11, 2015)

**10. Question: Regulations at 45 CFR 1355.52(i)(1)(iii)(B), 1355.57(a)(2)(ii), and 1355.57(b)(2)(ii) prohibit a title IV-E agency from claiming Comprehensive Child Welfare Information System (CCWIS) cost allocation for an automated function that is duplicated. When is an automated function considered duplicated within the CCWIS?**

**Answer:** A CCWIS automated function is duplicated within the CCWIS if more than one automated function within the CCWIS itself supports the same child welfare business practice. If automated functions supporting child welfare business processes in the CCWIS are duplicated in a child welfare contributing agency (CWCA), we no longer consider that to conflict with the regulatory requirement for non-duplication. This is because, our initial interpretation is unduly narrow and may be a disincentive for title IV-E agencies to continue to innovate and update the CCWIS and contract with CWCA's for services as needed. Duplication exists only if an automated function for the same child welfare business practice within the CCWIS itself is duplicated, and not across the CCWIS and CWCA's. For example, it is no longer considered a duplicated function if the CCWIS supports foster care placement activities and a CWCA system duplicates that support. Therefore, CCWIS automated functions that are duplicated by automated functions in a CWCA may qualify for CCWIS cost allocation.

This question and answer is repeated in the Initial Submission and Cost Allocation for New CCWIS sections.

- **Source/Date:** 02/03/2022
- **Legal and Related References:** 45 CFR 1355.52(a)(3); 45 CFR 1355.52(i)(1)(iii)(B); 45 CFR 1355.57(a)(2)(ii) and (b)(2)(ii)